

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHUN-KO CHANG, individually and on behalf of  
all others similarly situated,

Plaintiff,

-against-

SHEN YUN PERFORMING ARTS, INC., FEI  
TIAN COLLEGE, FEI TIAN ACADEMY OF THE  
ARTS, DRAGON SPRINGS BUDDHIST INC.,  
INTERNATIONAL BANK OF CHICAGO,  
SHUJIA GONG a/k/a TIANLIANG ZHANG,  
HONGZHI LI, and RUI LI,

Defendants.

**Civil Action No.: 7:24-CV-8980 (PMH)**

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL**

Pursuant to Local Civil Rule 1.4, the movant respectfully makes this motion for leave to withdrawal as counsel for Defendant SHUJIA GONG a/k/a TIANLIANG ZHANG (the “Defendant”), in the above-captioned matter, and respectfully requests that his name be removed from the docket and the ECF distribution list.

**I PROCEDURAL HISTORY**

On or about November 25, 2024, Plaintiff filed her Complaint. Plaintiff purports to have effectuated service upon the Defendant on or about December 20, 2024, which would have required a responsive pleading on or before January 10, 2025. *See* Affidavit of Service (Dkt. 16).

On or about January 2, 2025, the undersigned filed a notice of appearance on behalf of Defendant and sought an extension of time to answer, move or otherwise respond to the Complaint. *See* Motion (Dkt. 25). The Court granted the motion on January 6, 2025, requiring a responsive pleading to be filed on or before February 19, 2025. *See* Order (Dkt. 26, Jan. 6, 2025).

At all times, the movant faithfully represented the Defendant and worked diligently and efficiently, advocating, respecting and preserving all rights and defenses, and ensuring all deadlines were maintained.

## **II. REASON FOR WITHDRAWAL**

The reason for this request is that the Defendant has retained new counsel (i.e., Steven Schneebaum, Justin Butterfield, Lea Patterson, and Terri Marsh), who have appeared on behalf of Defendant.

The movant anticipates that incoming counsel will need and promptly seek an extension of the current date for responding to the Complaint.

Defendant consents to and has requested the undersigned make this motion.

Date: February 5, 2025  
Deer Park, New York

/s/ Justin R. Marino

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SHUJIA GONG a/k/a TIANLIANG ZHANG